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NOEL L. HILLMAN U.S. DISTRICT JUDGE May 22, 2007

VIA HAND DELIVERY

The Honorable Noel L. Hillman United States District Court District of New Jersey Mitchell H. Cohen U.S. Courthouse 1 John F. Gerry Plaza, Room 6020 Camden, NJ 08101

Re:

Workman, et al. v. Menu Foods, et al.

Case No.: 07-cv-1338

Dear Judge Hillman:

My firm serves as local counsel with a number of firms that have filed class action cases throughout the United States, including this District. We wish to address to the Court our concerns with the current proposed "solicitation" letter submitted by a limited number of Plaintiffs' counsel.

Without notifying my firm (and dozens of other firms with pending class cases in this and other Districts), a limited number of Plaintiffs' counsel unilaterally filed the current motion before your Honor. While we have no objection to certain aspects of the motion, from our viewpoint, the proposed letter submitted by a limited number of self-selected counsel (who have yet to obtain any courtapproved leadership role) may create more problems than it solves.

For example, a number of the firms listed as signatories to the letter apparently have been included in this self-appointed leadership structure for "political" reasons undisclosed to this Court. To allow a self-selected group of firms to be the 'only' plaintiffs' firms listed as signatories to such an important letter is totally inappropriate.

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As such, on behalf of my firm's clients (as well as the dozens of other firms intentionally excluded from this process), we object to the distribution of the proposed letter to class members without full and fair representation by all counsel with pending MDL cases.

Very respectfully,

Michael A. Ferrara, Ji

cc: William M. Audet, Esquire Scott A. Kamber, Esquire

Lisa J. Rodriquez, Esquire Jason Holfield, Esquire Frank Jablonski, Esquire

Jeremy Hutchinson, Esquire

Thomas M. Ferlauto, Esquire

John Blim, Esquire Larry Drury, Esquire

Gerald H. Hanson, Esquire